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Hearing Date and Time:
January 31, 2020 at 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

34 Holding Corp.,

Case No. 18-23408 (RDD)

Debtor.

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**LIMITED OBJECTION TO PLAN ADMINISTRATOR'S
MOTION TO DETERMINE CONTROVERSY**

**TO THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:**

34 Holding Corp., (the "Debtor"), by and through its counsel, hereby respectfully submits its limited objection (the "Objection") to the Motion to Determine Controversy filed by 34 W. 128 Funding, Inc. (the "Plan Administrator") for the following reasons:

1. The Debtor has no interest in the outcome of the interest calculation.
2. The Plan Administrator recalculated or reviewed its interest calculation and determined that there may have been an error in its favor in the amount of \$42,159.55.
3. Presumably for this reason, it set aside this amount in its escrow account, the benefit of which belongs to the second mortgage holder or any additional administrative expenses of the estate, not the Debtor.
4. The Plan Administrator has an obligation to correctly calculate and to release the escrow to itself or the proper party accordingly.

Dated: Norfolk, CT

January 24, 2020

/s/Amanda Medina
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